

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

Eliseo Rivera Cortés, Gloria Pillot, et al,

*Plaintiffs*

v.

Airport Catering Services, Corp.,  
Union Independiente de Trabajadores  
de Aeropuertos

*Defendants*

Civil No. 98-2092(GG)

CIVIL ACTION

**MOTION IN OPPOSITION TO MOTION ASSUMING LEGAL REPRESENTATION OF  
4 ADDITIONAL CO-PLAINTIFFS**

TO THE HONORABLE COURT:

Comes now Co-Defendant, Airport Catering Services Corp., hereinafter referred to as ACS, represented by its undersigned attorneys and very respectfully states and prays as follows:

1. On November 22, 2004, brother counsel, Luis R. Mellado González, Esq., filed a motion informing this Honorable Court that he was assuming the legal representation of four (4) additional co-plaintiffs (Vilma Alejandro Candelario, José Ramón Betancourt Nazario, Carlos Rodríguez Vélez, and César Román González). See, Docket Entry # 101.

2. Although a review of the docket, in particular the Second Amended Complaint filed on March 19, 1999 (Docket Entry # 22), reveals that these individuals are parties to the present complaint, it also reveals that assumption by brother counsel of the legal representation of the above-four indicated plaintiffs, is tardy.

3. On April 14, 2003, this Honorable Court emitted an Order in which a final extension of time was granted, until April 26, 2003, to all remaining Plaintiffs to engage new

legal representation. See, Docket Entry # 70. Moreover, on May 12<sup>th</sup>, 2003, this Honorable Court emitted another Order in with it stayed the proceedings until June 13, 2003, for all remaining unrepresented parties to obtain new legal representation. See, Docket Entry # 74.

4. Notwithstanding the above, it is not until November 22, 2004, more than a year since the notification of the above-identified Orders, the above-four identified Plaintiffs have complied with the same.

5. Consequently, in view of the above, it is very respectfully requested that this Honorable Court deny the assumption of legal representation requested by the above-four plaintiffs, since it is clear that the time assigned by this Honorable Court has clearly and completely elapsed.

WHEREFORE, it is respectfully requested from this Honorable Court to deny the assumption of legal representation requested by the above-four plaintiffs, since it is clear that the time assigned by this Honorable Court has clearly and completely elapsed.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1<sup>st</sup> day of December, 2004.

I HEREBY CERTIFY that on December 1, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Luis R. Mellado-González, Esq.; José Carreras, Esq.; and Nereida Feliciano Ramos, Esq.

s/ Alberto R. Estrella Arteaga  
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